

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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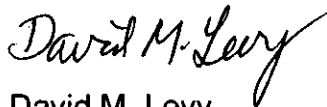
Docket No. R2000-1

Postal Rate and Fee Changes, 2000

**FIRST INTERROGATORIES OF ALLIANCE OF NONPROFIT MAILERS
TO USPS WITNESS KASHINI (ANM/USPS-T14-1-5)**

Pursuant to section 20 of the Commission's Rules of Practice, the Alliance of Nonprofit Mailers ("ANM") respectfully submits the attached interrogatories and document requests to USPS witness Cameron Interrogatories for Cameron Kashani (USPS-T-14). ANM incorporates by reference the instructions in OCA interrogatories OCA/USPS-1-14 (filed Jan. 24, 2000).

Respectfully submitted,



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Counsel for Alliance of Nonprofit Mailers

February 4, 2000

QUESTIONS

ANM/USPS-T14-1. Please refer to your Appendix A, pages 8, 16 and 24. At line 34, under the last column labeled "Savings," each table shows the identical figure of 407,770. For each table does this figure represent the sum of the data which appear in the column above it? Unless your answer is an unqualified affirmative, please explain fully what this number represents in each of the tables.

ANM/USPS-T14-2. Please refer to your Appendix A, page 8. Confirm that (i) for FY 1999 the net savings for clerks/mailhandlers combined amounts to 15,126,000 work hours and \$407,770,000, and (ii) the per work hour savings amount to \$26.76 (407,770/15,126). If you do not confirm, please provide the correct data and interpretation of the data shown at page 8.

ANM/USPS-T14-3. Please refer to your Appendix A, page 16. Confirm that (a) for FY 2000, the net savings for clerks/mailhandlers combined amounts to 14,138,000 work hours and \$441,793,000, and (b) the per work hour savings amount to \$31.25 (441,793/14,138). If you do not confirm, please provide the correct data and interpretation of the data shown at page 8.

ANM/USPS-T14-4. Please refer to your Appendix A, page 24. Confirm that (i) for FY 2001, the net savings for clerks/mailhandlers combined amounts to 16,625,000 work hours and \$475,373,000, and (ii) the per work hour savings amount to \$28.59 (475,373/16,625). If you do not confirm, please provide the correct data and interpretation of the data shown at page 8.

ANM/USPS-T14-5. If you confirm the per work hour savings in preceding

interrogatories ANM/USPS-T14-2, -3, and -4, please explain why the per work hour savings of \$31.25 in FY 2000 is 9.3 percent higher than the per work hour savings of \$28.59 in FY 2001. Produce documents sufficient to verify your answer.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

David M. Levy

February 4, 2000